

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to: 18-cv-04896.

MASTER DOCKET

18-md-2865 (LAK)

STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Skatteforvaltningen (“SKAT”) and Defendants The TKKJ LLC 401K Plan (“TKKJ Plan”) and Thomas Kertelits (“Kertelits”) hereby stipulate and agree that SKAT’s action against Defendants TKKJ Plan and Kertelits, captioned *Skatteforvaltningen v. The TKKJ LLC 401K Plan, et al.*, No. 18-cv-04896, which is part of these consolidated proceedings, is hereby voluntarily dismissed by SKAT, without prejudice, with each party bearing its own costs and attorneys’ fees.

Dated: New York, New York
October 10, 2023

By: /s/ Marc Weinstein
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Thomas Kertelits*

SO ORDERED:

Lewis A. Kaplan
United States District Judge